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By Hand (with enclosures) and ECF (without
thumb drives)

November 9, 2017

The Honorable George B. Daniels
Judge, United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD) (FM)

This filing applies to the following cases:

Federal Insurance Co., et al. v. al Qaida, et al., No. 03-cv-6978
Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al., No. 03-cv-8591
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03-cv-9849
Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.,
No. 04-cv-1922
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04-cv-5970
Cantor Fitzgerald Assocs., et al. v. Akida Inv. Co., et al., No. 04-cv-7065
Pacific Employers Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.,
No. 04-cv-7216
Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 04-cv-7279
Beazley Furlonge Ltd. v. Saudi Binladin Group, Inc., et al., No. 16-cv-7456
Bowrosen, et al. v. Kingdom of Saudi Arabia, No. 16-cv-8070
McCarthy, et al. v. Kingdom of Saudi Arabia, No. 16-cv-8884
Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-9663
Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-9937
Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-117
DeSimone v. Kingdom of Saudi Arabia, No. 17-cv-348
Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-450
The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi
Arabia, et al., No. 17-cv-2129
The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.,
No. 17-cv-2651
General Reinsurance Corp., et al. v. Kingdom of Saudi Arabia, No. 17-cv-3810
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-3887
Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al., No. 17-cv-3908
Abrams, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-4201
Abtello, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-5174

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Aasheim, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-5471
Allianz Versicherungs-Aktiengesellschaft, et al. v. Kingdom of Saudi Arabia,
No. 17-CV-6519
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen,
et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914
Abbate v. Kingdom of Saudi Arabia, No. No. 17-cv-8617

Dear Judge Daniels:

I represent the *O'Neill* Plaintiffs and I am a member of the Plaintiffs' Executive Committee in the above-captioned matter. I write, on behalf of the PECs, with regard to the filing of certain materials relating to the *Consolidated Amended Complaint Plaintiffs* set forth above.

Pursuant to your Honor's October 30, 2017 Order (ECF No. 3773) (copy enclosed) authorizing the Plaintiffs' Executive Committees to file voluminous documentary materials and evidence offered in support of their Memorandum of Law in Opposition to the Renewed Motions to Dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina with the Clerk of the Court, enclosed please find for filing, with regard to the master MDL docket, two (2) thumb drives: (a) Thumb Drive "A" containing Exhibits 23-83 (identified in the Affirmation of J. Scott Tarbutton being filed electronically today), and (b) Thumb Drive "B" containing Exhibits 1-104 (identified in the Affirmation of Robert Haefele being filed electronically today; including correlating files with a "T" suffix for documents that have been translated).¹

I have further enclosed an additional copy of this letter which I would appreciate being date and time stamped to acknowledge receipt and returned to us in the stamped, self-addressed envelope provided.

Courtesy copies of the thumb drives are being delivered to your Chambers and those of Magistrate Judge Netburn, and are being hand-delivered to counsel for the Kingdom of Saudi Arabia, the Saudi High Commission, and the *Ashton* plaintiffs.

Should you experience any difficulties with the drives, please do not hesitate to reach out to me directly.

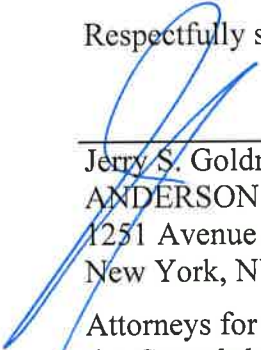
¹ The Memorandum of Law in Opposition to the Renewed Motions to Dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina and affidavits in support of the same are being filed via ECF today.

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Thank you for your consideration in permitting this means of submission.

Respectfully submitted,



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1251 Avenue of the Americas, 42nd Floor
New York, NY 10020

Attorneys for the *O'Neill* Plaintiffs and on behalf of
the *Consolidated Amended Complaint* Plaintiffs

Enclosures: ECF 3773 and two thumb drives

cc: The Honorable Sarah Netburn
Magistrate Judge, United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, NY 10007
BY HAND

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EXHIBITS BY HAND/LETTER VIA EMAIL

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EXHIBITS BY HAND/LETTER VIA EMAIL

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752 Third Avenue, 32nd Floor
New York, NY 10017
Counsel for the *Ashton* Plaintiffs
VIA FEDEX

All Counsel of Record (letter only- via ECF)

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND OVERNIGHT MAIL

October 27, 2017

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: OCT 30 2017RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committees, on behalf of the Consolidated Amended Complaint ("CAC") Plaintiffs and the *Ashton* Plaintiffs, write to respectfully request the Court's endorsement of the below proposals concerning page limits for further briefing as to the Motions to Dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina ("SHC"). The Kingdom and SHC join in this request. Plaintiffs also seek the Court's approval of an administrative proposal relating to their oppositions.

As the Court is aware, the Kingdom of Saudi Arabia previously filed a 75 page¹ Memorandum of Law in support of its Motion to Dismiss the separate CAC and *Ashton* complaints. The SHC filed a separate Memorandum of Law in support of its Motion to Dismiss, totaling 25 pages. Pursuant to the Court's Order of April 13, 2017, ECF No. 3514, the CAC Plaintiffs and *Ashton* Plaintiffs are filing separate oppositions to those motions.

After spending considerable time working on the opposition briefs, and after conferring with counsel for the defendants, the parties propose as follows:

¹ The CAC and *Ashton* plaintiffs consented to the Kingdom's request for an extension of the page limit for its brief to 75 pages, based on the Kingdom's separate assurances to the CAC and *Ashton* Plaintiffs that it would consent to comparable extensions of the page limit for their briefs.

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1. The CAC Plaintiffs will file a single brief in opposition to the separate Motions to Dismiss of the Kingdom and SHC, not to exceed 80 pages;
2. The *Ashton* Plaintiffs will file a single brief in opposition to the Motions to Dismiss of the Kingdom and SHC, not to exceed 70 pages; and
3. The Kingdom and SHC will be afforded 75 pages in total for their replies.

The parties believe that the proposal outlined above will allow for the most effective presentation of the issues to the Court.

The PECs respectfully request the Court's authorization to file documentary materials and evidence offered in support of their Oppositions with the Clerk's office via a CD or thumb drive. The Court authorized plaintiffs to do so earlier in the litigation, and the PECs understand that a specific order authorizing the filing of exhibits via a CD or thumb drive will be required by the Clerk's office to do so again in this instance. We will of course serve those materials on counsel for the defendants, and provide courtesy copies to the Court, in whatever form the Court would prefer.

We thank Your Honor in advance for the Court's attention to this matter.

Respectfully,

COZEN O'CONNOR



By: Sean P. Carter

SPC/bdw

cc: The Honorable Sarah Netburn
All Counsel of Record

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